



Australian Government

Tertiary Education Quality and Standards Agency

Integrating the Provider Information Request into the Higher Education Data Collection

Consultation Paper

July 2019

TEQSA

Definitions

"PIR providers"	Non-HESA-providers, and HESA-funded providers who report "Staff" data.
TEQSA	Tertiary Education Quality and Standards Agency
PIR	Provider Information Request
HEDC	Higher Education Data Collection
"the Department"	Australian Government Department of Education
TCSI	Transforming the Collection of Student Information
"the TEQSA Act"	Tertiary Education Quality and Standards Agency Act 2011
"the HESA Act"	Higher Education Support Act 2003
COPHE	Council of Private Higher Education
IHEA	Independent Higher Education Australia
ACPET	Australian Council for Private Education and Training
HEPCAT	Higher Education Provider Client Assistance Tool
NHF	Non-HESA-funded higher education providers
HEIMS	Higher Education Information Management System
ASD	Australian Signals Directorate
B2G	Business to Government API
API	Application Programming Interface
Packet	Interchangeable with 'Flat File'; refers to a submission file in the context of the API submission method.
"Flat File"	Interchangeable with 'Packet'; refers to a submission file in the context of the Portal submission method.
SMS	Student Management Solution

Revision History

Version Number	Date	Author(s)
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0.9	24.04.2019	Timothy Howard (IM Program Officer, TEQSA)
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Introduction

Background

The Provider Information Request (PIR) is undertaken to ensure key data is available for all higher education providers, to support a data-driven, risk-based approach to regulating the higher education sector. The Tertiary Education Quality and Standards Agency (TEQSA) utilises this data to minimise the reporting burden upon providers associated with regulatory processes, such as a renewal of registration.

The collection serves as a complementary collection to the Department of Education and Training's (the Department) Higher Education Information Management System (HEIMS) data collection. It collects supplementary data that is otherwise not included in HEIMS, including the student data of 34 higher education providers and staff data of over 130 higher education providers not captured under subsection 19-70(1) of the *Higher Education Support Act 2003* (HESA Act).

In 2016, TEQSA transitioned the formal administration of the PIR to the Department. The transition was a significant milestone towards creating an extensive, unified national collection for higher education data – an objective both TEQSA and the Department had worked to establish over several years. Under the transitioned arrangements, PIR student and staff data is reported through the Higher Education Provider Client Assistance Tool (HEPCAT) under separate submission files, due to scope differences in the specifications of the PIR and HEIMS data collections.

The Department is currently undertaking a major redevelopment of the Higher Education Data Collection (HEDC), named the *Transforming the Collection of Student Information* (TCSI) project.¹ Key objectives of the project include: direct reporting between provider systems and the Department; adoption of a unique student identifier for all students; and the reduction in size of the collection through the removal of duplicated data elements.

The TCSI project will introduce a number of significant changes to how the PIR functions, specifically: HEPCAT will be replaced by a choice of two new submission methods; the scope of the PIR will be expanded and revised to ensure full compatibility with HEIMS, improving data quality and analysis; and, the collection period will be brought forward to earlier in the year to allow for earlier access to full-year datasets.

Purpose

This paper describes TEQSA's approach to navigating the issues involved with streamlining the collection into the broader TCSI project, whilst minimising additional compliance burden upon providers. The requirement to examine the PIR, due to changes

¹ More information on the *Transforming the Collection of Student Information* (TCSI) project is available in the discussion paper, *Redevelopment and Audit of the Higher Education Data Collection*, available at <https://heimshelp.education.gov.au/sites/heimshelp/files/redevelopment-and-audit-of-the-higher-education-data-collection.pdf>.

brought by TCSI, provides a valuable opportunity to re-evaluate and improve the collection against TEQSA's regulatory principles and deliverables.

The alignment of data elements between the PIR and HEIMS will enhance data validity and reduce the possibility of data inconsistencies. To enable this alignment, the collection scope must be expanded to cover the minimum mandatory elements of the updated HEIMS specification. This expansion, alongside the streamlining of reporting periods, will allow TEQSA to draw upon a more comprehensive and timely source of data, allowing for more efficient and effective regulatory assessment processes, which in turn further improve the accuracy of assessment outcomes.² These actions will also serve to reduce information gaps in provider profiles, providing an improved evidence base to better inform policy development, good practice and student choice.³

TEQSA is proposing the choice of two submission pathways to substitute HEPCAT. The Business to Government (B2G) application programming interface (API) permits a provider's student management solution to establish a direct connection to the Department, enabling the real-time reporting of data to occur with minimal intervention. An alternative solution, the Provider Portal, will be available for smaller providers who are unable to implement a student management solution (SMS), allowing for the submission of data through an online form or spreadsheet (e.g. Microsoft Excel). This choice will be left to providers – should a provider choose to implement an SMS, the reporting of student data will become seamless; otherwise, spreadsheet reporting through the Portal will continue to be available. The reporting of staff data will continue as a spreadsheet submission through the Portal.

The objectives of this project are to:

- streamline and align TEQSA and Department data collections, wherever feasibly possible
- audit the current data schematic for informational gaps and improve data quality and breadth
- determine how PIR providers will report, access and utilise data
- align the timing of the TEQSA and Department data collections.

The outcome of this project will be a single, unified reporting system for universities, higher education and vocational institutions. PIR providers will benefit from the technological advances of the TCSI project, primarily through the implementation of the new B2G API which will generate significant savings in time and effort for providers who choose to utilise the solution. Those who choose to utilise the alternative Provider Portal will still benefit from the removal of ineffective and duplicated data elements from the collection scope, reducing compliance burden. Moreover, the alignment to HEIMS will support improved insights into how their operations are tracking compared to other non-HESA-funded and HESA-funded providers.

² See *Action 1.4: Enhance TEQSA's approach to monitoring, assessment and management of risks* in the "TEQSA Corporate Plan 2018-22" at <https://www.teqsa.gov.au/sites/default/files/corporate-plan-2018.pdf?v=1535417773>.

³ See *Action 3.2: Provide information about the sector to inform policy development, good practice and student choice* in the "TEQSA Corporate Plan 2018-22" at <https://www.teqsa.gov.au/sites/default/files/corporate-plan-2018.pdf?v=1535417773>.

Consultation process

TEQSA has established a comprehensive consultation process to ensure that all feedback is considered as the Agency re-evaluates the PIR data collection. The discussion points contained within this paper are a starting point to guide stakeholder feedback. Stakeholders are encouraged to use the consultation process to raise any further ideas or commentary that might help improve the implementation plan.

Guiding this consultation is TEQSA's commitment to working with all PIR providers to continually improve the collection process, and to ensure that the most effective, relevant dataset is produced.

Process

Throughout the outlined process, TEQSA will provide regular updates using the Agency's e-News, social media accounts and website to keep the sector informed of progress on the re-evaluation and transition.

Step One: Consultation paper and proposed schematic distributed

To begin the consultation process and seek feedback, this consultation paper will be distributed to the two peak sector bodies who represent the majority of PIR providers – the *Australian Council for Private Education and Training (ACPET)* and *Independent Higher Education Australia (IHEA)* – alongside a proposed data schematic, to seek feedback. This paper will also be presented to individual PIR providers.

Step Two: Consideration of submissions

TEQSA will consider all submissions received before the closing date of 20 September 2019 and will attempt to incorporate any relevant recommendations into the implementation plan.

Step Three: Stakeholder discussion and information forums

A number of forums will be held with interested provider representatives to inform and discuss the implementation plan. PIR providers are welcome to nominate representatives for these forums by sending a request to collections@teqsa.gov.au.

Step Four: Final schematic and documentation distributed

The consultation process will conclude with the release of a final data schematic and data element dictionary, to ensure all PIR providers are ready to migrate to the new system in time for the 2020 PIR.

Making a submission

Format

Your submission should clearly state the following information:

- the name of the organisation and/or individual who is making the submission (if an organisation, please provide details of a contact person)
- your contact details, including at a minimum the following:
 - an address
 - an email address
 - a telephone number.

Submission

Submissions and other enquiries can be sent electronically or by post using the following details. Submissions must be received before the closing date of 20 September 2019 to be eligible for consideration.

Electronic submission

Email address: collections@teqsa.gov.au

Subject: PIR TCSI Integration Project Submission

Postal submission

Information Management Team
Tertiary Education Quality and Standards Agency
GPO Box 1672
Melbourne VIC 3001

Confidentiality

TEQSA will not accept submissions that are provided on a wholly confidential basis. If you consider that information in your submission should be treated as confidential, please provide this information as a separate attachment and clearly indicate this in your submission.

For more information on TEQSA's *Privacy Policy*, including the Agency's collection of information and use or disclosure of personal information, please view the *Privacy* section of the TEQSA website.

Further guidance

If you have any enquiries regarding the content of this consultation paper, or alternatively the consultation process, you are welcome to contact us by email at collections@teqsa.gov.au.

Summary of changes

This section outlines the challenges and opportunities in implementing changes to the PIR data collection process, including the rationale for these revisions in line with TEQSA's regulatory principles, and how the changes will benefit providers.

Reporting process

Issue

A key objective of the TCSI project is to establish direct reporting between provider systems and the Department. The current submission pathway used by providers, HEPCAT, is not equipped to handle this functionality and also suffers from a number of other deficiencies. For example, HEPCAT validates submissions on a file-level rather than a record-level, and will decline the entire file submission even if there is only one failed record. Moreover, HEPCAT must be installed locally and is currently only compatible with Microsoft Windows 7, meaning that submissions cannot currently be made using Apple Mac, Linux or modern Windows 10 systems.

Any replacement submission pathway must balance the technological advancements of TCSI with the level of transitional impact upon providers, whilst delivering an improved front-end experience for the user.

Proposal

To reduce transitional burden upon providers, TEQSA is proposing the choice of two submission pathways to replace HEPCAT:

- The B2G API permits a provider's student management system to establish a direct connection to the Department, enabling real-time reporting of data to occur with minimal human intervention.
- The Provider Portal, designed for smaller providers who are unable to implement a student management system, allows for the submission of data through an online form or spreadsheet (e.g. Microsoft Excel).

The PIR is currently composed of 5 submission files, although this will be expanded to 10 files to maintain referential integrity and consistency with the TCSI project. This change will reduce duplication and limit the likelihood of data reporting errors. Providers

choosing to utilise the Provider Portal will be most impacted by this change, as the B2G API will handle this process in the background.

All providers, regardless of what method they choose to utilise in the reporting of student data, will be required to use the Provider Portal to submit staff data through a spreadsheet submission.

Further information on the restructuring of the file structure can be found in the accompanying *Provider Information Request Data Schematic* and *Provider Information Request Data Dictionary* contextual documentation.

Benefits

- A singular reporting process for universities, higher education and vocational institutions, achieved through the streamlining of the PIR into the broader HEIMS data collection.
- The choice of two user-friendly submission pathways – the preferred B2G API, which achieves significant time savings for providers by enabling real time data feeds through the establishment of a connection between provider systems and the Department, and the alternative Provider Portal.
- Reduced learning curve in comparison to the training required with HEPCAT, as your student management system would handle an API submission, and the Department's backend infrastructure would automatically interpret and translate the data fields of a Provider Portal submission to those of TCSI, reducing any transitional impact on providers.



Discussion

For PIR providers who choose to utilise the 'Provider Portal', what other benefits or unforeseen implications that might impact your institution do you see arising with this proposed transition? How can these complications be mitigated and what viable alternatives might be a better solution?

Data scope and TCSI alignment

Issue

PIR providers currently report against a maximum of 45 data elements, whilst HESA-funded providers report against a maximum of 137 data elements. If PIR providers were to directly transition over to the HEIMS data collection, they would be subject to a 72 per cent increase in data elements to report against. Out of these 45 data elements, only 9 do not have a direct equivalent within the HEIMS data scope, meaning that the PIR could be otherwise streamlined into the broader HEIMS collection relatively easily.

Many duplicated elements currently exist within the PIR data scope, while other existing elements have been identified as ineffective, producing information gaps within provider

profiles. Specifications of PIR data elements also sometimes differ from their equivalents in HEIMS, producing data inconsistencies when comparative analyses are undertaken.

Proposal

TEQSA proposes to expand the scope of the PIR with a view to improve the quality of data and to align the collection to become fully-compatible with the TCSI project, whilst attempting to minimise compliance burden.

It is envisaged that an additional 41 new data elements be added and 10 existing data elements be removed or superseded. These additional elements will likely have little impact on providers, as they are primarily demographic in nature, and will already be captured by providers. Duplicated elements will be removed wherever feasible. In addition, 22 existing data elements will also be revised in an effort to improve the effectiveness of the collection, with some of these elements being split in two for clarity and simplicity.

Expanding the scope of the PIR will also further strengthen the validity of risk indicators and measurements by allowing TEQSA to draw upon a more comprehensive and detailed dataset, reducing information gaps in provider profiles and improving general data quality and breadth which serve to inform improved analysis and regulation of the higher education sector. An expansion is also necessary to align data elements between the PIR and HEIMS data collections.

An alignment of these data elements will reduce the possibility of data inconsistencies, allowing for strengthened comparative analysis between NHF and HESA-funded providers. Moreover, it will allow providers to exploit the many technological advances and front-end improvements brought about by TCSI, reducing the time and effort spent reporting. As TCSI will also provide a singular reporting process for all types of higher education institutions, it will also grant a straightforward transitional path for providers who aspire towards gaining FEE-HELP accreditation.

A proposed data schematic, including an overview of the changes outlined, can be found in the accompanying *Provider Information Request Data Schematic* contextual document.

Benefits

- Data elements will be standardised and aligned between the PIR and HEIMS data collections, reducing the possibility of data inconsistencies and allowing for more effective and efficient regulatory processes.
- New areas of analysis possible with the availability of an expanded evidence base, whilst overall data quality will improve with the removal of unnecessary data elements and the revision of existing elements.



Discussion

What do you think of the proposed data schematic? Do you see any weaknesses in any of the data elements presented? Are there further things we could do to make the collection more user-friendly and efficient?

Submission period alignment

Issue

The HEIMS data collection will transition to direct reporting with the HEDC redevelopment, enabling real-time reporting of data on an ongoing basis. Once this occurs, there will be no set reporting period for the collection. Rather, data will flow on a continual basis between provider systems and the Department. One of the primary objectives of the redevelopment is to make a full-year of verified student data available earlier in the year, meaning the PIR will need to be brought forward to allow this objective to eventuate.

Proposal

TEQSA proposes a move of the PIR submission period from its current August submission window to March, to allow a full-year of verified student data to be made available earlier. The change in timing would make the processing of data more efficient, as data from HEIMS and the PIR could be verified concurrently, removing unnecessary overheads by essentially merging two disparate processes into a singular, streamlined process.

Benefits

- A full-year snapshot of verified student data will be made available earlier in the year, with a single submission period in March to align with the HEIMS data collection.
- Removal of unnecessary overheads by allowing HEIMS and PIR data to be verified concurrently, streamlining two processes into one, thereby allowing the HEDC to become more efficient.
- Allows TEQSA to better plan cyclical regulatory activities and assessments, providing more certainty around the timing of data availability, in turn further ensuring the accuracy of assessment outcomes.



Discussion

How will the change in timing to March impact upon your institution's operations? How might these impacts be further mitigated?

Data security, integrity and privacy

Issue

The Department's transformation of the HEDC will mean that the centralised data repository will begin using new technologies (i.e. cloud-based 'Data Lake'). These technologies bring a number of distinct advantages, including the futureproofing of the platform to be compatible with new and emerging technologies.

There are a number of privacy implications that will need to be considered in a transition to using cloud-based technology. Under the proposal, data that falls under the *Tertiary Education Quality and Standards Agency Act 2011* (TEQSA Act) will be stored alongside other data collected by the Department that falls under the HESA Act. Under existing arrangements between the Department and TEQSA, the Department collects PIR data pursuant to the TEQSA Act and releases it directly to TEQSA for the purposes of undertaking its regulatory functions. With the transition to cloud-based technology, TEQSA will undertake work to ensure similar safeguards around data separation and segregation are in place to protect personal information from unsolicited use.

Further work will need to be undertaken in consultation with the Department and the Office of the Australian Information Commissioner to determine whether it is appropriate to obtain consent from individuals to store their personal information on cloud-based technology, and if so, potential disclosure arrangement options.

Proposal

While data legislated under both the TEQSA and/or the HESA Acts will be stored together within the Department's central data repository, access to TEQSA-legislated data will continue to be limited to TEQSA officers for the purposes of the agency's regulatory functions. All personal information collected by TEQSA is protected by the *Privacy Act 1988* (the Privacy Act). TEQSA is committed to protecting personal information and will undertake a review to ensure adequate safeguards for the protection of personal information under the proposal against requirements contained within the Privacy Act, the *Privacy (Australian Government Agencies – Governance) APP Code 2017* and the Guidelines for Federal and ACT Government World Wide Websites, issued by the Privacy Commissioner.

The Department's central data repository will be secured using best practice tools and techniques, whilst the cloud infrastructure that will be hosting the data will be Australian Signals Directorate certified, approved for Commonwealth Government use and audited by the relevant agencies to ensure that data security and integrity will be maintained.

Benefits

- Future-proofing the infrastructure of the Department's central data repository, allowing it to make use of new and emerging technologies.
- Centralisation of inter-agency data into one singular repository will reduce costs and overheads, whilst being hosted on an expandable, load-balanced and secure cloud environment.
- Data security and integrity is ensured, with access to records being limited by their relevant legislative act, whilst the data infrastructure itself is approved and audited by the relevant government agencies following due process.



Discussion

Are there any further data security and privacy issues around the storage of student/staff personal information collected by your institutions on cloud-based technology that you believe TEQSA should consider?

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